## THE LAW OFFICES OF STEVEN E. LYNCH

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January 12, 2024

## **BY ECF**

Hon. Lewis J. Liman Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007 REQUEST GRANTED AS TO GRAMOS MUHAXHERI and VINCENS VUKTILAJ. The Sentencing hearing previously set for February 1, 2024 is RESCHEDULED to February 26, 2024 at 11:30AM in Courtroom 15C at the 500 Pearl Street Courthouse.

1/16/2024 SO ORDERED.

LEWIS J. LIMAN United States District Judge

Re: United States v. Gramos Muhaxheri, 23 Cr. 560 (LJL)

Dear Judge Liman,

I write jointly on behalf of Gramos Muhaxheri, who I represent in the above-referenced matter, and Vincens Vuktilaj, who is represented by Marisa Cabrera, Esq. of the Federal Defenders. Your Honor is currently scheduled to sentence Gramos Muhaxheri and Vincens Vuktilaj on February 1, 2024. I write on behalf of both defendants to respectfully ask the Court to adjourn their sentencing for approximately three weeks to any day between February 21st and February 26<sup>th</sup>. The government consents to this request. There have been no previous requests for an adjournment.

I continue to gather letters on behalf of Mr. Muhaxheri to include with his sentencing submission, some of which require translation from Albanian to English. In addition, it is my understanding that the government intends to introduce video surveillance evidence at the defendants' sentencing. An adjournment will provide the defense with an opportunity to obtain and review the videos with the defendants prior to filing their sentencing submissions. Moreover, the defense is still awaiting the final PSR report.

For these reasons, we respectfully request an adjournment to any day between February 21st and February 26<sup>th</sup>, and a corresponding adjustment of the due date for sentencing submissions. As noted, the government consents to the adjournment. Thank you for your consideration.

Respectfully submitted,

Steven E. Lynch

Attorney for Gramos Muhaxheri

Cc: All counsel of record (by ECF)